

EPA Registration No.
83923-4
vol. 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

July 21, 2014


I, Venus Eagle, Insecticide/Rodenticide Branch, Registration Division, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Jordan) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Ensystex Iv, Inc
4110 136Th Street
Gig Harbor, WA 98332

EPA Registration Number: 83923-4
Name of Product: PROTHOR SC 2


Venus Eagle
Risk Manager 01
Insecticide/Rodenticide Branch
Registration Division (7505P)



ENSYSTEX, Inc.

2175 Village Dr., P. O. Box 87329, Fayetteville, NC 28304
Voice - 1-888-398-3772 Fax - 1-888-368-4479 www.ensystex.com

July 10, 2014

Document Processing Desk
Office of Pesticide Programs (7504P)
US. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

VE

Attention: Gold Seal Label Request M006

I am requesting Gold Seal Labels for the following products. These labels will be used for registration purposes in Lebanon.

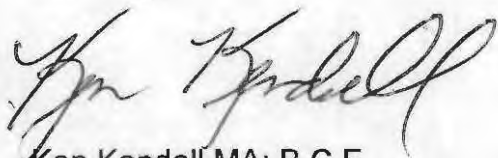
Borathor EPA Reg.# 81824-8
Prothor SC 2 EPA Reg.# 83923-4
Maxxthor SC EPA Reg.# 81824-5
Bithor SC EPA Reg.# 83923-2

I am also requesting Gold Seal Labels for the 2 products below. These labels will be used for registration purposes in Jordan.

Borathor Granular Scatter Bait EPA Reg.# 81824-12
Abathor Gel Bait EPA Reg.# 83923-8

You will find enclosed a check for \$1578.00 for the PRIA Fee for M006 for these 6 products. Thank you very much in advance for your prompt response.

Sincerely,



Ken Kendall MA; B.C.E.
V.P. Technical Services & Governmental Affairs

333333

Receipt for Section 3

S: 955150

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Amendment

Fee For Service: ☒ Yes ☐ No

Company: 83923 ENSYSTEX IV, INC

Billable: ☒ Yes ☐ No

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 1

Product #: 83923-4

Product Name: PROTHOR SC 2

Override#:

Me Too Section3:

Me Too Product Name:

Application Date: 10-Jul-2014

OPP Rec'd Date: 14-Jul-2014

Front End Date: 14-Jul-2014

Risk Manager Send Date: 18-Jul-2014

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Gold Seal Certificate for Lebanon

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

Des

Other

Gold Seal

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 18, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-493279
EPA File Symbol or Registration Number: 83923-4
Product Name: PROTHOR SC 2
EPA Receipt Date: 14-Jul-2014
EPA Company Number: 83923
Company Name: ENSYSTECH IV, INC

KEN KENDALL
ENSYSTECH IV, INC
2175 VILLAGE DRIVE, PO BOX 87329
FAYETTEVILLE, NC 28304-

SUBJECT: Receipt of Request for Gold Seal Certification Letter(s)

Dear Registrant:

The Office of Pesticide Programs has received your request for Gold Seal Certification letter(s) that is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The action has been identified as action code M006:

UP TO 5 GOLD SEAL CERTIFICATION LETTERS PER REGISTRATION

No additional payment is due at this time. If you have any questions, please contact Betty Williams at (703) 308-0132.

Sincerely,

A handwritten signature in black ink, appearing to be "Ken Kendall".

Front End Processing Staff
Information Technology & Resources Management Division

ENSYSTEX, INC.

INVOICE #		INVOICE DATE	AMOUNT	DISCOUNT	CHECK NO. 020712	VENDOR KEY ENV002	VOUCHER #	NET AMOUNT
		7/11/2014	1,578.00	0.00			000027973	1,578.00
TOTAL			1,578.00	0.00				1,578.00

Another Quality Product From Altec (800) 333-5180 PFWB5C

THIS DOCUMENT IS PROTECTED BY INVISIBLE FIBERS AND CHEMICALLY REACTIVE PAPER. HOLD TO LIGHT TO VERIFY A TRUE WATERMARK.

ENSYSTEX, INC.
P.O. BOX 87329
FAYETTEVILLE, NC 28304-7329
(910) 485-5720

BB&T
BRANCH BANKING AND TRUST COMPANY
FAYETTEVILLE, NC 28302
66-112/531

020712

DATE
7/11/2014

CHECK NO.
020712

ONE THOUSAND FIVE HUNDRED SEVENTY-EIGHT AND XX / 100

AMOUNT

****1,578.00

PAY
TO THE
ORDER OF

ENVIRONMENTAL PROTECTION AGENCY
ONE POTOMAC YARD ROOM S-4900
2777 S. CRYSTAL DRIVE
ARLINGTON, VA 22202

VOID AFTER 60 DAYS

AUTHORIZED SIGNATURE

020712

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

April 17, 2014

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (**FNL LBL**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA Reg. No. 83923-4)
Submission of Final Product Labeling per the Agency Letter dated January 31, 2014

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. and in response to the Agency letter dated January 31, 2014 please find enclosed the final product labeling for Prothor SC 2 (EPA Reg. No. 83923-4).

In support of this submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Prothor SC 2 final product labeling

Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83293-4	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Prothor SC 2	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Ensystex IV, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 1/31/2014
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final product label per the Agency letter dated January 31, 2014.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1.08, 2.15 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg		Title Agent	
		Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Michael Kellogg		5. Date 4/17/14	



PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient: By Wt.
Imidacloprid21.4%
Other Ingredients:78.6%
TOTAL:100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: 1.08 Gal.

Manufactured by:
ENSYSTEX IV, Inc.
2175 Village Drive, Fayetteville, NC 28304

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and waterproof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-

sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging in the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators. This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar. Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When using this Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator active plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at

<http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>. Pesticide incidents (for example, bee kills) should immediately be reported to the state / tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at www.npic.orst.edu or directly to EPA at beekill@epa.gov.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

See individual use sites for specific pollinator protection application restrictions. If none exist under the specific site, for outdoor foliar applications, follow these application directions.



Do not apply PROTHOR SC 2 while bees are foraging. Do not apply PROTHOR SC 2 to plants that are flowering. Only apply after all flower petals have fallen off.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensys IV at 1-866-367-8467 or Chemtec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician must be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes*, *Heterotermes* and *Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table

level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for specified distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank $\frac{1}{4}$ to $\frac{1}{3}$ full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2		
Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
0.10%	1000	275.0 (2 gallons + 19 ounces)
	1	0.55
	2	1.10
	5	2.75
	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = $A \times 0.275$

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = $A \times 0.55$

Proportional Injector Mixing Table For PROTHOR SC 2	
Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes must not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure

spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical

conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to not puncture these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes must be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 linear feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls:

Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls:

Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes must be spaced so as to achieve a continuous chemical barrier. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and

injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.
2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.
3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.
4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl

spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

When drilling veneer walls, care must be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Restriction: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

- Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
- Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
- After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment specifications listed below prior to making an application.

- Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
- Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
- When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is

equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's specified amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount of foam according to the foaming agent and foaming equipment manufacturer's specifications. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the specified volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the specified rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or

landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase its vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however do not allow excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover prior to bloom or after all petals have fallen off, adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Restrictions: Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried. Do not allow this product to contact plants in bloom while bees are foraging the treatment area.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Restrictions: Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

PROTHOR SC 2 controls or suppresses a wide range of listed soil inhabiting turfgrass insect pests.

Restrictions:

- PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.
- Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.
- Do not apply more than 25.6 fl oz. (0.4 lb a.i.) per acre per year.
- Do not mow turf or lawn area until sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.
- Do not allow this product to contact plants in bloom while bees are foraging the treatment area.
- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not allow runoff or puddling of irrigation water following application.
- Keep people and pets off treated area until dry.

Application Sites

Permitted sites: lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the listed target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Do not mow turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected. Irrigate if rainfall does not occur within 24 hours. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Preparations

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product

in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf Applications	
Use Rate	Amount of PROTHOR SC 2 per 1,000 sq. feet
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft.
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass atenioides, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Applications Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots

up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Restrictions

- Follow application restrictions on page 2 to protect bees and other insect pollinators
- Do not apply more than 25.6 fl oz. (0.4 lb a.i.) per acre per year
- Keep people and pets off treated area until dry
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.
- PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.
- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted.
- Do not plant edible plants in soil that has been treated with PROTHOR SC 2

Application Sites

For use on the following ornamental plants: trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Restriction: Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. The use of a spreader/sticker

may help applications to plants with hard to wet foliage such as holly, pine or ivy.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed, not to exceed 25.6 fl oz. (0.4 lb a.i.) per acre per year.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen

containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Restrictions

- Do not apply more than 25.6 fl. oz. (0.4 lb a.i.) per acre per year. Keep people and pets off treated area until dry.
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.
- Do not allow runoff or puddling of irrigation water following application.
- Do not apply to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.
- PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.
- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

Application Sites

For use on the following ornamental plants: trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around the perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer),

Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs

0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensyslex IV, Inc., it is impossible for Ensyslex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensyslex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYLEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensyslex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensyslex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYLEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR

HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYLEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensyslex IV, Inc.

EPA 20140131

ENSYSTEX IV, Inc.

2713 Breezewood Ave., P. O. Box 87329, Fayetteville, NC 28304
Voice - 1-910-485-5720 Fax - 1-888-368-4479 www.ensystex.com

April 18, 2011

To Whom It May Concern:

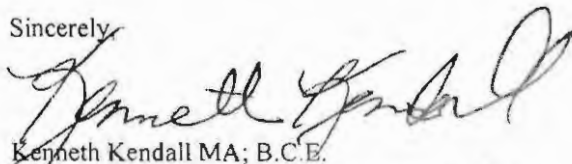
RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay and Michael Kellogg of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Ensystex IV, Inc. (EPA Company Number 83923), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Kenneth Kendall MA; B.C.E.
V.P. Technical Services & Governmental Affairs

cc: Pyxis Regulatory Consulting, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

May 1, 2014

I, Venus Eagle, Insecticide/Rodenticide Branch, Registration Division, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Jordan) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Ensystex Iv, Inc
4110 136Th Street
Gig Harbor, WA 98332

EPA Registration Number: 83923-4
Name of Product: PROTHOR SC 2

Venus Eagle
Risk Manager 01
Insecticide/Rodenticide Branch
Registration Division (7505P)



ENSYSTEX, Inc.

2175 Village Dr., P. O. Box 87329, Fayetteville, NC 28304
Voice - 1-888-398-3772 Fax - 1-888-368-4479 www.ensystex.com

April 25, 2014

Document Processing Desk
Office of Pesticide Programs (7504P)
US. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

VE

Attention: Gold Seal Label Request M006

I am requesting Gold Seal Labels for the following products. These labels will be used for registration purposes in Jordan. You will find enclosed a check for \$1052.00 for the PRIA Fee for M006 for these 4 products. Thank you very much in advance for your prompt response.

Borathor EPA Reg.# 81824-8

Prothor SC 2 EPA Reg.# 83923-4

Maxxthor SC EPA Reg.# 81824-5

Bithor SC EPA Reg.# 83923-2

Sincerely,



Ken Kendall MA; B.C.E.

V.P. Technical Services & Governmental Affairs

ENSYSTEX, INC.

		DATE	4/25/2014	CHECK NO.	020316	VENDOR KEY	ENV002
INVOICE #	INVOICE DATE	AMOUNT	DISCOUNT	VOUCHER #	NET AMOUNT		
	4/25/2014	1,052.00	0.00	000027491	1,052.00		
TOTAL		1,052.00	0.00		1,052.00		

Another Quality Product from Altec (800) 333-5180 PFWB530LZ

ORIGINAL CHECK HAS A COLORED BACKGROUND PRINTED ON CHEMICAL REACTIVE PAPER

ENSYSTEX, INC.

P.O. BOX 87329
FAYETTEVILLE, NC 28304-7329
(910) 485-5720

BB&T
BRANCH BANKING AND TRUST COMPANY
FAYETTEVILLE, NC 28302
66-112/531

020316-C

8263

DATE

4/25/2014

CHECK NO.

020316

ONE THOUSAND FIFTY-TWO AND XX / 100

AMOUNT

****1,052.00

PAY
TO THE
ORDER OF

ENVIRONMENTAL PROTECTION AGENCY
ONE POTOMAC YARD ROOM S-4900
2777 S. CRYSTAL DRIVE
ARLINGTON, VA 22202

VOID AFTER 60 DAYS

[Signature]

AUTHORIZED SIGNATURE

RED CHECK NUMBERING IMAGES THROUGH TO BACK OF SHEET

020316



Receipt for Section 3

S: 951437

Milestone Email:

Regulatory Type: Product Registration - Section 3

Application Type: Amendment

Company: 83923 ENSYSTEX IV, INC

Risk Manager: Registration Division, Risk Management Team 1

Product #: 83923-4

Product Name: PROTHOR SC 2

Override#:

Me Too Section3:

Me Too Product Name:

Application Date: 25-Apr-2014

Front End Date: 28-Apr-2014

FFS Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Gold Seal Certificate (1)

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Resubmission: ☐ Yes ☒ No

Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No

V

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Other

Gold Seal

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 29, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-490515
EPA File Symbol or Registration Number: 83923-4
Product Name: PROTHOR SC 2
EPA Receipt Date: 28-Apr-2014
EPA Company Number: 83923
Company Name: ENSYSTECH IV, INC

KEN KENDALL
ENSYSTECH IV, INC
2175 VILLAGE DRIVE, P.O. BOX 87329
FAYETTEVILLE, NC 28304-

SUBJECT: Receipt of Request for Gold Seal Certification Letter(s)

Dear Registrant:

The Office of Pesticide Programs has received your request for Gold Seal Certification letter(s) that is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The action has been identified as action code M006:

UP TO 5 GOLD SEAL CERTIFICATION LETTERS PER REGISTRATION

No additional payment is due at this time. If you have any questions, please contact Betty Williams at (703) 308-0132.

Sincerely,

A handwritten signature in black ink, appearing to be "J. H. Williams".

Front End Processing Staff
Information Technology & Resources Management Division

Material Sent for Data Extraction

Reg. # 839234

Description: smud

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 1/30/14

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Jennifer Urbanski

Phone: 347-0156 Division: RD

Date: 1/30/14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St., NW
Gig Harbor, WA 98332

JAN 10 2014

Subject: Amended label to add pollinator language
Product Name: Prothor SC 2
EPA Reg. No. 83923-4
EPA Decision No. 485464
Submission dated September 27, 2013

Dear Ms. Pruett:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. See 40 CFR 156.10(a)(6).

Under 40 CFR 152.130(d), EPA may establish dates by which all product distributed or sold by the registrant must bear revised labeling. The following paragraphs set forth the schedule for ensuring that that your product bears revised labeling within a reasonable time period.

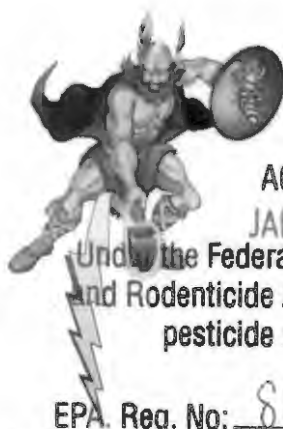
- Any product released for shipment after 2/28/14 must bear the new label.

If these conditions are not complied with, EPA will take appropriate action against this registration. If you have any questions please contact Dr. Jennifer Urbanski at 703-347-0156 or urbanski.jennifer@epa.gov.

Regards,

A handwritten signature in black ink, appearing to read "Venus Eagle", with a long horizontal flourish extending to the right.

Venus Eagle, Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)



ACCEPTED

JAN 31 2014

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

EPA Reg. No:

83923-4

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior landscapes.

Active Ingredient:	By Wt.
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: _____ Gal.

Manufactured by:

ENSYSTEX IV, Inc.

2175 Village Drive, Fayetteville, NC 28304

FIRST AID

If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 to 20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rise slowly and gently with water for 15 to 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and waterproof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-

sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging in the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar. Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When using this Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator active plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at

<http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>. Pesticide incidents (for example, bee kills) should immediately be reported to the state / tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at www.npic.orst.edu or directly to EPA at beekill@epa.gov.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

See individual use sites for specific pollinator protection application restrictions. If none exist under the specific site, for outdoor foliar applications, follow these application directions.



Do not apply PROTHOR SC 2 while bees are foraging. Do not apply PROTHOR SC 2 to plants that are flowering. Only apply after all flower petals have fallen off.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician must be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes*, *Heterotermes* and *Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table

level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for specified distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank $\frac{1}{4}$ to $\frac{1}{3}$ full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2		
Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	1	0.55
	2	1.10
	5	2.75
	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions ($1/2 = .5$).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = $A \times 0.275$

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = $A \times 0.55$

Proportional Injector Mixing Table For PROTHOR SC 2	
Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes must not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure

spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical

conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to not puncture these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes must be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 linear feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls:

Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls:

Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes must be spaced so as to achieve a continuous chemical barrier. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and

injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.
2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.
3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.
4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl

spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.
2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

When drilling veneer walls, care must be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Restriction: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

- Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
- Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
- After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment specifications listed below prior to making an application.

- Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
- Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
- When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is

equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's specified amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount of foam according to the foaming agent and foaming equipment manufacturer's specifications. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the specified volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the specified rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or

landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase its vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however do not allow excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover prior to bloom or after all petals have fallen off, adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Restrictions: Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried. Do not allow this product to contact plants in bloom while bees are foraging the treatment area.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Restrictions: Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

PROTHOR SC 2 controls or suppresses a wide range of listed soil inhabiting turfgrass insect pests.

Restrictions:

- PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.
- Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.
- Do not apply more than 25.6 fl oz. (0.4 lb a.i.) per acre per year.
- Do not mow turf or lawn area until sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.
- Do not allow this product to contact plants in bloom while bees are foraging the treatment area.
- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not allow runoff or puddling of irrigation water following application.
- Keep people and pets off treated area until dry.

Application Sites

Permitted sites: lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the listed target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Do not mow turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected. Irrigate if rainfall does not occur within 24 hours. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Preparations

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product

in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf Applications	
Use Rate	Amount of PROTHOR SC 2 per 1,000 sq. feet
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft..
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Applications Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior landscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots

up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Restrictions

- Follow application restrictions on page [x] (*note to reviewer – page number will be added to commercial label*) to protect bees and other insect pollinators
- Do not apply more than 25.6 fl oz. (0.4 lb a.i.) per acre per year
- Keep people and pets off treated area until dry
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.
- PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.
- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted.
- Do not plant edible plants in soil that has been treated with PROTHOR SC 2

Application Sites

For use on the following ornamental plants: trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Restriction: Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. The use of a spreader/sticker may help applications to plants with hard to wet foliage such as holly, pine or ivy.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed, not to exceed 25.6 fl oz. (0.4 lb a.i.) per acre per year.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when

PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Restrictions

- Do not apply more than 25.6 fl. oz. (0.4 lb a.i.) per acre per year. Keep people and pets off treated area until dry.
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.
- Do not allow runoff or puddling of irrigation water following application.
- Do not apply to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.
- PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.
- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

Application Sites

For use on the following ornamental plants: trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior landscapes at and/or around the perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks. public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low

pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs

0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED

ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

EPA [approval date]

Urbanski, Jennifer

From: Leanne Pruett [Leanne@PyxisRC.com]
Sent: Friday, January 17, 2014 3:04 PM
To: Urbanski, Jennifer
Subject: RE: 83923-4
Attachments: 083923-00004.20140117.Prothor SC 2 bee protection language - with EPA updates.pdf

Hey, Jenn –

Here you go – last Ensystex IV label!

Best,
Leanne

From: Urbanski, Jennifer [mailto:urbanski.jennifer@epa.gov]
Sent: Wednesday, January 15, 2014 7:07 AM
To: Leanne Pruett
Subject: RE: 83923-4

Hey Leanne, here are the comments ☺

- 1) On page 2 delete the title Non-Agricultural Use Sites. Throughout the label, as in your other labels, change the "Follow application restrictions..." sentences so the reference to "Non-Agricultural Use Sites" is deleted.
- 2) On page 2, change "See individual sites..." to read "See individual use sites..."
- 3) On page 8, change "Treat soil, turf or ground cover (flower, shrub and plant beds)..." to read "Treat soil, turf or ground cover prior to bloom or after all petals have fallen off..."
- 4) On page 9, change "...controls or suppresses a wide range of soil inhabiting..." to read "...controls or suppresses a wide range of listed soil inhabiting..."
- 5) On page 9, change "...can be made prior to egg laying by the target pest(s)" to read "...can be made prior to egg laying by the listed target pest (s)".
- 6) On pages 9 and 10, change "...controls a wide range of insects on trees..." to read "...controls a wide range of listed insects on trees..."
- 7) On pages 10 and 11, change "For use on ornamental plants including trees..." to read "For use on the following ornamental plants: trees..."

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]
Sent: Tuesday, January 14, 2014 2:25 PM
To: Urbanski, Jennifer
Subject: RE: 83923-4

It's probably wishful thinking that Venus won't have any updates – but if she doesn't, could you give me a quick 'head's up', and I'll send you the updated first page of the label with Ensystex's proper mailing address.

Thanks,
Leanne

From: Urbanski, Jennifer [mailto:urbanski.jennifer@epa.gov]
Sent: Tuesday, January 14, 2014 2:24 PM
To: Leanne Pruett
Subject: RE: 83923-4

Hey Leanne, the PM is looking at it now, hopefully she'll finish today!

From: Leanne Pruett [<mailto:Leanne@PyxisRC.com>]
Sent: Tuesday, January 14, 2014 2:21 PM
To: Urbanski, Jennifer
Subject: RE: 83923-4

Hi, Jenn –

Do you know if there will be any more updates from your end for the Prothor SC 2 (83923-4)? I've got to update the Ensysdex address on this label, and if there are updates, I'll do it then – otherwise I'll update the label I sent to you on Jan 8th.

Thanks,
Leanne

From: Leanne Pruett
Sent: Wednesday, January 08, 2014 11:32 PM
To: 'Urbanski, Jennifer'
Subject: RE: 83923-4

Hi, Jenn –

Here's the updated label for Prothor SC 2 (83923-4).

Best,
Leanne

From: Urbanski, Jennifer [<mailto:urbanski.jennifer@epa.gov>]
Sent: Monday, December 30, 2013 1:47 PM
To: Leanne Pruett
Subject: 83923-4

Hi Leanne, another one! Thanks!

Jennifer Urbanski, Ph.D., Biologist
Insecticide-Rodenticide Branch, S7221
Registration Division (7505P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
(703) 347-0156



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Ensystex IV, Inc / 83923-4	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Prothor SC 2	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St., NW, Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is a fast track amendment to incorporate the new pollinator protective language.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name P. Leanne Pruett		Title Agent		Telephone No. (Include Area Code) 253-853-7368	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					8. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name P. Leanne Pruett		5. Date September 27, 2013			

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 27, 2013

Venus Eagle (PM1)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501
ATTENTION: Pollinator Fast-Track Amendment

RE: Ensystex IV, Inc. – submission of label amendment to Imidacloprid products to add pollinator protection language, including the following products:

- Bithor SC GC (EPA Reg. No. 83923-1)
- Bithor SC (EPA Reg. No. 83923-2)
- Prothor SC 0.5 (EPA Reg. No. 83923-3)
- Prothor SC 2 (EPA Reg. No. 83923-4)
- Turfthor 2F (EPA Reg. No. 83923-5)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc., I am submitting a series of applications to amend the registrations of the above-listed subject products, to add pollinator protection language to the product labels. The language is being added in response to Steven Bradbury's August 15th, 2013 letter regarding Pollinator Protection Labeling for Nitroguanidine Neonicotinoid Products.

In support of these label amendments, the following documents are enclosed for each product:

1. EPA Application Form 8570-1
2. One (1) copy of product label with changes tracked
3. Three (3) copies of product label with changes incorporated
4. One copy of the proposed label on CD
5. Certification with respect to Label Integrity

Additionally, I have enclosed a letter of authorization, allowing Pyxis to act as Ensystex's agent with EPA.

As per Steven Bradbury's August 15, 2013 letter, these amendments qualify as non-PRIA fast track amendments. Please note we are not including amendments for Turfthor 2.5G or 0.5G (EPA Reg. No's 83923-9 and 83923-10), as they are granular products, and these updates are not required for granulars. If you have any questions or concerns regarding these amendment applications, or require additional information, please contact me at (253) 853-7369 or Leanne@PyxisRC.com.

Best Regards,



P. Leanne Pruett
Pyxis Regulatory Consulting

Enclosures
cc: Ensystex IV, Inc.

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
83923-4	September 27, 2013	083923-00004.20130927.Prothor SC2 bee protection language.PDF

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

9-27-2013
Date

P. Leanne Pruett

Name (typed)

Agent

Title



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 25, 2013

OFFICE OF CHEMICAL
SAFETY
AND POLLUTION
PREVENTION

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 2
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-4
EPA RECEIPT DATE: 10/23/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

A handwritten signature in black ink, appearing to be "SJM".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

38

Fee for Service

{942451È~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 1

Receipt No.

S- 942451

EPA File Symbol/Reg. No.

83923-4

Pin-Punch Date:

10/23/2013

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *S. Fateh*

Date: 10/25/13

Remarks:

